

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

ROBERT MENENDEZ, NADINE  
MENENDEZ, WAEL HANA, JOSE URIBE,  
AND FRED DAIBES,

Defendants.

Case No. S4 23-cr-490 (SHS)

**DECLARATION OF AVI WEITZMAN**

**UNDER SEAL**

I, Avi Weitzman, declare under oath as follows:

1. I am a partner at Paul Hastings LLP, counsel to Senator Robert Menendez.
2. I submit this Declaration in support of Senator Menendez's Motion for Rule 15

Depositions (the "Motion").

3. The entity referred to in the Motion (and the Indictment) as the "Qatari Investment Company" is [REDACTED]

4. To protect the privacy of the proposed deponents, the Motion uses pseudonyms for each proposed deponent. The identities of the proposed deponents are as follows:

- a. The "Qatari Investor" is [REDACTED], the founder of [REDACTED], which he "established . . . to manage his international investment portfolio," according to his [REDACTED] website profile;
- b. The "COO" is [REDACTED], the Chief Operating Officer of [REDACTED];  
and
- c. The "GC" is [REDACTED], the General Counsel of [REDACTED].

5. Based on communications with counsel for each of the proposed deponents and the Qatari Investment Company, and independent investigation, I understand that all the proposed deponents principally reside in the United Kingdom.

6. Based on communications with counsel for the proposed deponents and the Qatari Investment Company, we understand that none of the proposed deponents will agree to travel to the United States to testify at trial or to appear voluntarily for a Rule 15 deposition.

7. Attached hereto as **Exhibit 1** is a true and correct copy of an FBI Form 302 purporting to summarize an interview of the COO that occurred on December 15, 2023.

8. Attached hereto as **Exhibit 2** is a true and correct copy of a document produced by the government in this action that purports to summarize a conversation between counsel for the government and counsel for the COO and the GC of the Qatari Investment Company.

9. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by the government in this action that purports to summarize a conversation between counsel for the government and counsel for the Qatari Investor.

10. Attached hereto as **Exhibit 4** is a proposed letter rogatory.

11. Attached hereto as **Exhibit 5** is a true and correct copy of email correspondence between counsel for the government and counsel for Senator Menendez regarding potential Rule 15 depositions of the proposed deponents.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 26, 2024

By: /s/ Avi Weitzman